

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FTE NETWORKS, INC.,
Plaintiff,

v.

SUNEET SINGAL, ET AL.,
Defendants.

Case No. 22-cv-5960 (PGG)

DECLARATION OF ANDREW K. STUTZMAN

Pursuant to 28 U.S.C. § 1746, Andrew K. Stutzman declares:

1. I am a Partner at the law firm Stradley Ronon Stevens & Young, LLP, which represents Defendants Suneet Singal; TTP8, LLC; First Capital Master Advisor, LLC; Majique Ladnier; Innovativ Media Group, Inc. (“Innovativ”); and Thomas Coleman (collectively, the “Responding Defendants”) in the above-captioned case.

2. I submit this declaration to place relevant documents into the record in support of Responding Defendants’ Opposition to Plaintiff’s Motion for Leave to Amend the Complaint and request that the Court take judicial notice of these documents.

3. Annexed hereto as **Exhibit 1** is a true and correct copy of Plaintiff’s Motion for Summary Judgment in *Innovativ Media Group, Inc. v. FTE Networks, Inc.*, No. A-22-849188-B (Clark County, Nev.).

4. Annexed hereto as **Exhibit 2** is a true and correct copy of Innovativ’s Motion for Leave to Amend Complaint including its proposed amended complaint in *Innovativ Media Group, Inc. v. FTE Networks, Inc.*, No. A-22-849188-B (Clark County, Nev.).

5. Annexed hereto as **Exhibit 3** is a true and correct copy of Plaintiff's Opposition to Innovativ's Motion for Summary Judgment on Special Damages in *Innovativ Media Group, Inc. v. FTE Networks, Inc.*, No. A-22-849188-B (Clark County, Nev.).

Date: May 26, 2023

/s/Andrew K. Stutzman

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